



FREY INDUSTRIES, INC.

A Total Physical Distribution Concept

P.O. Box 9307 • Newark, New Jersey 07104
201 / 482-0153 • Fax: 201 / 482-9480

07-14-62

September 25, 1989

237982



6 1989

Mr. Nikjou
Bureau of Hazardous Waste Engineering
New Jersey Department of Environmental
Protection
33 Arctic Parkway
CN 028
Trenton, NJ 08625-0028

Dear Mr. Nikjou,

This memo will confirm our meeting date on Tuesday, October 17, 1989 at 10:00 Am in your offices to discuss the following subjects:

- *Current status of Jobar Packaging & Warehousing, Inc. as they relate to a prior TSD Facility.
- *Current status of Frey Industries, Inc. as we relate to a interim TSD Facility.
- *Clarification of Frey Industries, Inc. status relative to actually being classified as:
 - a) Generator of Hazardous Waste
 - b) Storage Facility of Hazardous Waste
 - c) Transporter of Hazardous Waste
- *The apparent error by BASF in not using their generator number in 1988 on disposal forms, but indicating Frey/Jobar's EPA number.
- *The manner in which line washings are to be identified and stored upon completion of drummings or transfers of our customers raw materials from bulk to smaller containers.
- *The manner in which customer returns of damaged containers are to be identified and stored prior to customers approval to repackage, return or dispose of same.

WAREHOUSING • DRUMMING • PACKAGING • BULK TRANSFERS • RAIL AND TANK STORAGE
29 RIVERSIDE AVENUE • NEWARK, NEW JERSEY 07104

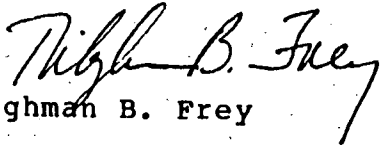
*The status of reefer damaged containers while they remain at our facility awaiting our customers disposition. These dispositions are based on insurance evaluations, quality approvals, etc.

*The status of storage tanks that are located on the third floor of Building #7, allegedly containing non-hazardous residue from PPG's occupancy in 1970.

I would also like to propose that we bring our environmental consultants, Dr. Richard Greenberg, President of Environmental Waste Management Associates and his associate William Wertz to this meeting, and that Messrs. Arnold Schiff and Boleslaw Czachor from your Metro Region office be in attendance, since they are most familiar with our facilities.

Thank you very much for your anticipated cooperation in this matter.

Very truly yours,



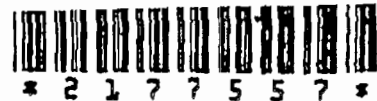
Tilghman B. Frey

TBF/ps

cc: B. Czachor - NJDEP - Metro Region
R. Greenberg - Environmental Waste Mgt.
W. Wertz - Environmental Waste Mgt.
T. Scherman, Chief, Hazardous Waste
A. Schiff - NJDEP - Metro Region
G. Yacoub, Bureau Chief - NJDEP
G. Redish, Esq. - Cole, Geaney, Yamner & Bray
C. Frey - Frey Industries
G. Grimes - Frey Industries



State of New Jersey
Department of Environmental Protection
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421



Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address BASE CORP @ FRYE IND ATTN: RALPH R. VILLANO		3000 CONTINENTAL DR NORTH MOUNT OLIVE NJ 07828-1234		A. State Manifest Document Number NJA 2177557		
4. Generator's Phone (201) 426-3193		6. US EPA ID Number NJ D986597326		B. State Facility's Name and Address 29 RIVERSIDE AVENUE NEWARK, NJ 07104		
5. Transporter 1 Company Name ENVIRON TRANSFER CORP		8. US EPA ID Number NJ D991291584		C. State Trans. ID-NJDEPE Decal No. NJDEPE6321-61151		
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone (201) 347-2215		
9. Designated Facility Name and Site Address ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION 1 EDEN LANE FLANDERS, NJ 07836		12. Containers		E. State Trans. ID-NJDEPE		
		13. Total Quantity		F. Transporter's Phone ()		
		14. Unit Wt/Vol		G. State Facility's ID N/A		
		15. Waste No.		H. Facility's Phone (201) 347-1909		
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) a. X WASTE FORMIC ACID 8, UN1779, II		12. Containers No. Type		13. Total Quantity		
b. CHEMICALS, n.o.s. DOT NON-REGULATED, NONE		001 DF		00400 P U123		
c.		004 DF		01600 P X910		
d.						
J. Additional Descriptions for Materials Listed Above L/C, T ERG#1779		K. Handling Codes for Wastes Listed Above a. Soil b. Soil				
S/- N,N' DIMETHYLOUREA						
PACKING SLIPS ATTACHED FOR CLARIFICATION EMERGENCY PHONE 1-800-832-HELP IF UNDELIVERABLE, CONTACT RALPH VILLANO AT (201) 426-3193						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name M HERRING		Signature M Herring FOR BART		Month Day Year 10 09 95		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Anthony Bove		Signature Anthony Bove		Month Day Year 10 09 95		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name MATTHEW COLE		Signature Matthew Cole		Month Day Year 08 03 95		

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

NJA 2177557



State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address BASF CORP @ FRYE IND		3000 CONTINENTAL DR NORTH ATTN: RALPH R. VILLANO MOUNT OLIVE NJ 07828-1234		NJ 10988597328		62282		A. State Manifest Document Number NJA 1994123	
4. Generator's Phone (201) 428-3193		5. Transporter 1 Company Name ENVIRON TRANSFER CORP		6. US EPA ID Number NJ 1099129158		7. Transporter 2 Company Name		8. US EPA ID Number	
9. Designated Facility Name and Site Address ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION 1 EDEN LANE FLANDERS, NJ 07838		10. US EPA ID Number		11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) HM		12. Containers No. Type		13. Total Quantity	
a. CORROSIVE SOLIDS, n.o.s. (BORON TRIFLUORIDE DIETHYLETHETERATE) 8, UN1759, I		001		DM		00400		P X910	
b. WASTE BORON TRIFLUORIDE DIETHYL ETHERATE 8, UN2604, I		016		DM		06400		P D001	
c. CHEMICALS, n.o.s. DOT NON-REGULATED, NONE		001		DM		00050		P X910	
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		a. S o i		c. S o i		b. S o i	
S/- BORON TRIFLUORIDE AND a. SPEEDY DRY		S/- 3-CYANO-2,6-DICHLORO c. 4-METHYLPYRIDINE		a. S o i		c. S o i		b. S o i	
L/I		d. S o i		a. S o i		c. S o i		b. S o i	
15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION PACKING SLIPS ATTACHED FOR CLARIFICATION LINE 1B ALSO CONTAINS D002 if undelivable, contact Ralph Villano at (201) 428-3193		EMERGENCY PHONE 800 535-5053 933 HLP							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and to use the best waste management method that is available to me and that I can afford.		Printed/Typed Name GARY GRIMES		Signature <i>Gary Grimes</i>		Month Day Year 10 9 1995			
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Anthony Bone		Signature <i>Anthony Bone</i>		Month Day Year 10 9 1995			
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Printed/Typed Name MATTHEW COLE		Signature <i>Matthew Cole</i>		Month Day Year 09 18 95			

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES



State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section

CN 421, Trenton, NJ 08625-0421

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Form Approved OMB No. 2050-0039, E-0115 2-30-84

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJEPF80597026	Manifest Document No. 74181	2. Page 1 of 1	Information in the shaded areas is not required by Federal law		
3. Generator's Name and Mailing Address BASF CORP & FIVE IND ATTN: RALPH R. VILLANO 3000 CONTINENTAL DR NORTH MOUNT OLIVE NJ 07828-1234				A. State Manifest Document Number NJA 1996390			
4. Generator's Phone (201) 426-3193				B. State Facility's ID NEWARK, NJ 07104			
5. Transporter 1 Company Name ADVANCED ENV TECH SRV(AETS)LLC				C. State Trans. ID-NJDEPE Dec NJDEPE6321-72773			
6. US EPA ID Number NJ ID 10 18 10 16 13 11 13 16 19				D. Transporter's Phone: 201 347-7111			
7. Transporter 2 Company Name				E. State Trans. ID-NJDEPE			
9. Designated Facility Name and Site Address ADVANCED ENVIRONMENTAL TECHNICAL SERVICES 1 EDEN LANE FLANDERS, NJ 07836				F. Transporter's Phone () G. State Facility's ID N/A H. Facility's Phone 201 347-1909			
10. US EPA ID Number NJ ID 10 18 10 15 13 16 15 19 13				Decal No. ()			
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) a. WASTE 1,2-BUTYLENE OXIDE, STABILIZED 3, UN3022, 11				12. Containers No. Type	13. Total Quantity 00030	14. Unit P	15. Waste No. 0001
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above L/I PACK LAB CHEMICALS a. ERG# 26				K. Handling Codes for Wastes Listed Above a. 51011			
b.				c.			
c.				d.			
d.				b.			
15. Special Handling Instructions and Additional Information PACKING SLIPS ATTACHED FOR CLARIFICATION 24 HOUR EMERGENCY NUMBER 1-800-832-HELP TRANSPORTER #1 FORMERLY E.T.C. DISPOSAL ORDER NUMBER 12218 IF UNDELIVERABLE, CONTACT RALPH VILLANO AT (201) 426-3193							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name JOSE BENAVIDES				Signature JOSE BENAVIDES		Month Day Year 02/14/86	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Larry Gallagher				Signature Larry Gallagher		Month Day Year 02/14/86	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Peter E. Frechotling							
Signature Peter E. Frechotling				Signature [Signature]		Month Day Year 02/14/86	

NJA 1996390